

PFE/MRP: AUG 2022

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

UNITED STATES OF AMERICA)
)
)
 v.) Case No.
)
)
 STEVE RAY SHICKLES, JR)

INFORMATION

COUNT ONE: [18 U.S.C. § 1343]

The United States Attorney charges that:

1. From approximately January, 2012 to approximately January, 2019, more specific dates unknown to the United States Attorney, in Madison County, within the Northern District of Alabama, the Defendant,

STEVE RAY SHICKLES, JR.,

devised and intended to devise a scheme and artifice to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, transmitted, and caused to be transmitted by means of wire, radio and television communication in interstate commerce, certain writings, signs, signals, pictures, and sounds, more specifically described below, for the purpose of executing such a scheme and artifice.

2. It was part of the scheme and artifice that **STEVE RAY SHICKLES, JR.**, would and did gain access to existing Simple Helix, Inc. financial accounts with PayPal, Inc. which held funds belonging to Simple Helix, Inc., by virtue of his job as chief Operations Officer at Simple Helix, Inc..

3. It was further part of the scheme and artifice that **STEVE RAY SHICKLES, JR.**, made multiple unauthorized charges, withdrawals and transfers from these Simple Helix, Inc. accounts with PayPal, Inc. for the purpose of using the funds for his personal expenses.

4. It was further part of the scheme and artifice that **STEVE RAY SHICKLES, JR.**, used at least one debit card connected to Simple Helix, Inc.'s PayPal account to pay for personal expenses. Each of these transfers and debit card transactions involved a wire which contacted and communicated with PayPal servers located in California.

5. It was further part of the scheme and artifice that **STEVE RAY SHICKLES, JR.** took steps to conceal his fraudulent activities, including directing a Simple Helix, Inc. employee to change a computer script which automated a daily email with a summary of Simple Helix, Inc. financial transactions. Without this change, the daily emails to Simple Helix, Inc. employees and shareholders would have revealed the multiple payments made to the Surreptitious Accounts and his use of the debit card tied to a Simple Helix, Inc. account. The change **STEVE RAY**

SHICKLES, JR. directed to the script excluded PayPal information from the update emails which allowed him to continue his fraudulent activities without detection.

6. It was further part of the scheme and artifice that **STEVE RAY SHICKLES, JR.** created the fraudulent email address, bXXXXXX.fXXXXXX@simplehelix.com, utilizing the name of an actual person who was not a Simple Helix, Inc. employee but who did act as Simple Helix, Inc.'s outside bookkeeper, and then directed the vendor via this fraudulent email account to deposit funds due and owing to Simple Helix, Inc. into his own personal account.

7. On or about May 14, 2018, within the Northern District of Alabama and elsewhere, the Defendant,

STEVE RAY SHICKLES, JR.,

having devised the above scheme and in furtherance thereof, cause to be transmitted by means of wire in interstate commerce, writings, signs, signals, pictures, and sounds to effect the transfer of \$75,000 from a PayPal account belonging to Simple Helix, Inc. to a bank account owned and operated by **STEVE RAY SHICKLES, JR.**

All in violation of Title 18, United States Code, Section 1343.

PRIM F. ESCALONA
United States Attorney

/s/ Electronic Signature
MICHAEL R. PILLSBURY
Assistant United States Attorney



Certified to be a true and
correct copy of the original.
Sharon N. Harris
U.S. District Court
Northern District of Alabama

By: *K. Bowman*
Deputy Clerk